

**DRAFT---ALASKA STATE AGENCY PLAN
OF PROGRAM OPERATION AND ADMINISTRATION
FOR THE COMMODITY SUPPLEMENTAL FOOD PROGRAM
FY15**

In accordance with Public Law 95-113, the State of Alaska hereby submits the following plan of Program Operation and Administration requesting program continuation of a Commodity Supplemental Food Program (CSFP) of the Food and Nutrition Services (FNS) of the United States Department of Agriculture (USDA).

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Acronyms and Definitions

Acronyms and Definitions

7 CFR 247	Chapter 7 Code of Federal Regulations, part 247, contains many of the program rules that apply to the Commodity Supplemental Food Program. Unless otherwise noted, references to 7 CFR 247 in this report pertain to the regulations published in the Federal Register, August 2005.
Administrative funds	Cash assistance provided to each CSFP State Agency to administer the program as described in 7 CFR 247
Benefits	Benefits in CSFP consist of a food package containing a prescribed quantity of USDA commodities
Beneficiary	A beneficiary receives CSFP benefits, as defined above
CSFP	Commodity Supplemental Food Program
Commodities Foods	Foods purchased by USDA through direct appropriations from Congress under surplus removal and price support activities
Distribution site	Agency that enters into an agreement with Grantee food banks to accept CSFP applications and deliver CSFP benefits to participants.
FNP	Family Nutrition Programs, Unit within the Alaska Department of Health and Social Services, the Alaska State agency responsible for administering the Commodity Supplemental Food Program
FNS	Food and Nutrition Service of the USDA
Grantee food bank	An organization that contracts with a State agency to perform functions such as food storage, food distribution and client certification
ME-Management Evaluation	Continual assessment of State agency program operations through on-site and desk review activities
State	Any of the 50 States, the District of Columbia, and Federally recognized Indian Tribes
State agency	The agency of a State government administering a USDA food distribution program
TEFAP	The Emergency Food Assistance Program
USDA	The United States Department of Agriculture

Purpose

Alaska's Family Nutrition Programs (FNP) has developed a comprehensive strategic plan. The mission of FNP is to support Alaskan families in making nutrition decisions for life-long health and wellbeing. FNP accomplishes its mission through a core public health functions approach. This includes surveillance and assessment of nutrition-related public health risks; development of policies and programs to promote nutritional health, improvement in awareness of community nutrition issues; and assurance of adequate nutrition for all Alaskans.

The core principles of the FNP Strategic Plan are:

To eliminate disparities in nutrition status among special populations.

Nutrition Services --

- should be based on researched and documented needs;
- should use the most appropriate technology to reach the intended clientele;
- should be provided at the point of need;
- should support environmental changes to enhance health status.
- should be implemented through community collaboration and partnerships.

Nutrition Education --

- should be client directed, culturally sensitive and presented within a caring environment;
- should be implemented through community collaboration and partnerships.

Nutrition education methods and materials should consist of concise messages to promote positive behavior changes and improved long-term health status at all stages of life.

The CSFP is complementary to other food and nutrition programs administered by FNP, including:

- SFMNP
- DHSS Senior Services
- Alaska Food Coalition.

The CSFP is in partnership with other state agencies:

- Alaska Commission on Aging
- DHSS Food Stamps and Food Stamp Education

The CSFP is a specific strategy towards and plays a key role to increasing:

- access to nutritious foods to the elderly;
- participation in food and nutrition assistance programs;
- percentage of Alaskans whose eating behaviors are positively impacted by various nutrition education activities;
- food security among Alaskan low income.

State and Grantee food bank Identification

Reference	Citation
247.5 (c) (1)	<p>The names and addresses of each grantee food bank.</p> <ul style="list-style-type: none"> (i) which have an agreement with the State agency for program administration; and (ii) the names and addresses of each certification, food distribution and storage site under the jurisdiction of the grantee food bank.

The FNP will continue to use its standard agreements with grantee food banks. The scope of work details the responsibilities of each grantee food bank in carrying out the CSFP.

State Agency Identification

The State of Alaska's Family Nutrition Program (FNP) will establish procedures for eligibility determination, track caseload and distribute administrative funds.

In addition, FNP will coordinate and implement fiscal policy, program policy and oversee food ordering. FNP will monitor storage, packaging and transporting activities from USDA to the point of delivery at local distribution sites. This includes monitoring local level CSFP on hand inventory and losses; record keeping systems, and receipt and distribution systems; local food packaging operations; and establishing and monitoring state and local food ordering systems.

To support grantee food bank efforts, FNP will partner with the agencies in development, production and distribution of client standardized applications, informational and nutrition education materials.

Grantee food bank Identification

It is the intent of FNP to operate CSFP in the cities of Fairbanks and Anchorage, and greater areas of south central Alaska and interior Alaska surrounding these cities. The grantee food banks will be the Fairbanks Community Food Bank and the Food Bank of Alaska in Anchorage.

These two agencies are:

Fairbanks Community Food Bank
 725 26th Ave.
 Fairbanks, AK 99701
 (907) 4552-7761 x 22
 Samantha Castle Kirstein, Executive Director

Food Bank of Alaska
 2121 Spar Avenue
 Anchorage, AK 99501
 (907) 277-3663
 Michael Miller, Executive Director

The Alaska Department of Health and Social Services requires that grantee food banks enter into a written agreement (Appendix A) with the department to obtain funds to operate a program administered by the department. FNP will maintain a standard State grant for administrative funding for each of the two grantee food banks, with a detailed Scope of Work for operating the CSFP in accordance with Federal and State regulations, policies and procedures. Grant application packets will be maintained and include the following basic information:

- Agency name, address, telephone number, contact person, authorized representative
- Types of services to be provided
- Food distribution sites
- Certification sites
- Area(s) to be served
- Racial/ethnic makeup of population to be served
- Civil Rights compliance
- Outreach efforts
- Nutrition education efforts

The Alaska Department of Health and Social Services requires that grantee food banks enter into a written agreement with the distribution agencies to operate a program administered by the department. FNP will maintain a list (Appendix B) of contact information for the Distribution Agencies that have entered into an agreement with the Grantee food bank.

Certification

Reference

Citation

247.5 (c) (2)

The specific income criteria and nutritional risk criteria (if used) to be used in certifying persons as being in need of supplemental foods and the period of time covered by certifications in each grantee food bank.

To be eligible for CSFP benefits in Alaska, a person must sign a completed a CSFP application (Appendix C), and meet the requirements for residence, and income eligibility. Applicants can self-declare age, residence, and income. If a concern exists for distributing agency staff, documentation can be requested.

Income Eligibility Criteria

The federal income guidelines of 130% of poverty for the state of Alaska will be used. These are amended each year and sent to the state agency by USDA-FNS. FNP will inform each grantee food bank of the most current income information.

Income eligibility is determined by comparing family size and family income with the CSFP income eligibility guidelines. Income eligibility is based on the most current indicator of their financial status. An applicant may self-report their total gross income.

Income Eligibility Screening

Traditional income eligibility screening is required. Usually this is done by self-reporting income. If staff feels the self-reporting is not accurate, an agency can request documentation may be requested. To be able to apply the guidelines, applicant household size and total income must be determined.

Family Size Determination

Family is defined as a group of related or non-related individuals, who usually, (although not necessarily), are living together as one economic unit. For pregnant woman, each embryo or fetus in utero must be counted as household members in determining if household meets income eligibility standards.

Family members who share economic resources and consumption of goods and/or services; may also be called “economic unit”, “family” or “household size”. Terms may be used interchangeably.

Military personnel serving overseas or assigned to a military base, even though not living with their families, should be considered members of the economic unit. Use of this option is dependent on what the grantee food bank can reasonably determine, based on available data, the total gross income of the economic unit.

Family Income Determination

An applicant’s income should be self-declared.

The CSFP definition of income includes gross cash earned by any and all members of a household or economic unit. It also includes any amount received or withdrawn from any source to live on, including savings.

Gross Income is defined as all income before deductions are made for income taxes, employee social security taxes, insurance premiums, bonds, etc.

CSFP does *not* permit a household’s gross income to be reduced for hardships, high medical bills, child care payments, taxes, child support, alimony, insurance, or other deductions.

Alaska Permanent Fund Dividends will be added to the income for each family member if received. Garnished permanent fund dividends will also be included.

Documentation

Traditional income eligibility screening is required. Usually this is done by self-reporting income. If staff feels the self-reporting is not accurate, an agency can request documentation may be requested. To be able to apply the guidelines, applicant household size and total income must be determined. If documentation is requested, it must be attached to the application and scanned into the computer file.

The following table lists what is included as gross income

Gross Income Includes:
Monetary compensation for services, including wages, salary, commissions, or fees
Active military payments
Food allowances for military households living off base
Net income from farm and non-farm self-employment
Social Security benefits, including Supplemental Security Income (SSI) disability benefits
Dividends or interest on savings or bonds, income from estates, trusts, or investments withdrawn to live on
Net rental income
Public assistance or welfare payments; Foster care
Unemployment compensation; Worker's Compensation
Government civilian employee or military retirement or pensions or veterans' payments
Private pensions or annuities
Alimony or child support payments
Regular contributions from persons not living in the household
Other cash income: Includes but is not limited to withdrawals from any source, including savings, investments, trust accounts and other resources are readily available to the family to live on.
Student financial assistance, such as grants and scholarships that do not require repayment. Work study earnings after costs for tuition, books, school supplies are subtracted
Alaska Permanent Fund Dividends

Grantee food bank staff will record income amounts for eligibility determination and documentation at the time of application and certification if needed. The CSFP Application Form will be used to document income in the application process. Proof of requested age, income, and residency should be put in the applicant's file and/or scanned into their computer file.

Acceptable Forms of Verification

Category	Acceptable Forms of Verification
Elderly --60 years and older normally able to obtain supplemental foods at the distribution site.	Self-reporting of Birthdate on the application is acceptable. If staff feels the self-reporting is not accurate, an agency can request documentation may be requested. If documentation is requested, it must be attached to the application and scanned into the computer file. For requested proof of age, a birth certificate or hospital record of birth are preferred. If not available, use any of the following which shows applicant's name and date of birth: state ID card; insurance policy; driver's license; clinic, doctor or hospital record; religious records; US passport or US citizen ID card; marriage or divorce record; voter's registration card; military record, welfare ID card; any other document providing identifying data sufficient to establish proper age.
Homebound Elderly --60 years and older unable to acquire their own foods due to medical conditions, lack of a valid driver's license or a restricted driver's license preventing transportation to the distribution site.	Same as Elderly.

Residency Eligibility

Persons eligible for Alaska's CSFP must reside in Alaska. There is no duration or fixed residency requirement. Migrant and seasonal farm workers shall be considered as meeting the residency requirement. Grantee food banks are authorized to serve residents from regions outside their normal service area, but within Alaska.

Elderly persons living in nursing homes do not qualify for program benefits.

Application

The following persons may apply on behalf of elderly persons:

- A spouse, relative or caretaker of the elderly applicant if the applicant is homebound or for any reason unable to apply on his/her own behalf. The CSFP staff must be assured that the elderly individual does exist. A home visit or a telephone conversation with the elderly individual must occur unless staff has knowledge that the elderly applicant is alive and not living in a nursing home.
- The proxy must be listed on the application and the proxy must provide picture ID to pick up the senior boxes.

Other applicants are to apply on behalf of themselves.

Certification Periods

Each participant will be certified for program benefits in accordance with the following timeframes.

Elderly - An elderly person will be certified at the time of entrance into the program and will verify their certification information at six-month intervals thereafter. They will complete a new application every other certification period.

Waiting Lists

When there are insufficient program slots available to provide benefits to all eligible applicants, a waiting list will be established. Applicants on waiting lists will be served in order of priority.

Individuals will be notified of their placement on a waiting list and the right to a fair hearing within 20 days after they visit the grantee food bank during office hours. Participants placed on a waiting list at the end of their certification period will receive written notification of their placement on a waiting list. Staff will retain a copy of the notice.

New applicants that are placed on a waiting list will be told verbally that they are on a waiting list or can be given written notification. If verbal notification is given, it will be documented.

To enable the grantee food bank to contact individuals on the waiting list when caseload space becomes available, the waiting list will include:

- Applicant's name
- Date placed on the waiting list
- An address or phone number of the applicant
- Applicant's priority status

Partially completed certification forms that contain the above listed information may be placed in a waiting list file in the same order as the waiting list.

When program slots are open, the grantee food bank will contact persons by date of application

Certification of Homebound Elderly and Persons with Disabilities

Homebound elderly are defined as persons who are, in the judgment of the grantee food bank, unable to obtain monthly food packages without the assistance provided by or through the grantee food bank.

Disability is defined as a physical or mental impairment that substantially limits one or more of the major life activities of such individuals.

Homebound elderly and persons with disabilities will be certified at their home or health clinic by CSFP staff or by other grantee food bank staff. Volunteers can collect eligibility data; however, CSFP staff must finalize the certification.

Statement of Nondiscrimination

The program application form must include a statement of nondiscrimination that informs the applicant that program standards are applied without discrimination by race, color, national origin, age, sex, or disability. After informing the applicant (or caretaker) of his or her rights and responsibilities, in accordance with Federal regulation, the grantee food bank must ensure that the applicant, or the adult caretaker of the applicant, signs the application form beneath the following pre-printed statement. The statement must be read by, or to, the applicant (or adult caretaker) before signing.

“This certification form is being completed in connection with the receipt of Federal assistance. Program officials may verify information on this form. I am aware that deliberate misrepresentation may subject me to prosecution under applicable State and Federal statutes. I may not receive CSFP benefits at more than one CSFP site at the same time. Furthermore, I am aware that the information gathered may be shared with other organizations to detect and prevent dual participation. I have been advised of my rights and responsibilities under the program. I certify that the information I have provided for my eligibility determination is correct to the best of my knowledge. I authorize the release of information provided on this application form to other organizations administering assistance programs for use in determining my eligibility for participation in other public assistance programs and for program outreach purposes.”

Rights and Responsibilities

The grantee food bank is responsible for informing program applicants, orally or in writing, of the following rights and responsibilities:

1. Improper use or receipt of CSFP benefits as a result of dual participation or other program violations may lead to a claim against the individual to recover the value of the benefits, and may lead to disqualification from CSFP; and
2. Participants must report changes in household income or composition within ten (10) days after the change becomes known to the household.

Fair Hearings

Each program applicant or participant will be informed in writing of his/her right to a fair hearing and of the illegality of dual participation at initial and subsequent certifications. This will be part of the State approved application form, which the applicant will sign. It will include the following:

Individuals will be notified of their eligibility, ineligibility, or placement on a waiting list for the program within 10 days of the application date. Any individual found ineligible at any time during a certification period will also be notified. The participant will be notified in writing a minimum of 15 days prior to termination of program benefits. They will also be informed of their rights to a fair hearing at that time.

Each participant will also be notified, in writing, at least 15 days prior to expiration of their certification period that the period is about to end. Grantee food banks, at the time of application or when notifying a person found ineligible of their right to a fair hearing, will advise the individual of the method of requesting a hearing and their right to be represented at the hearing by a friend, legal advisor, or other representative of their choice, and give them a summary of the hearing process.

Grantee food banks will advise those found ineligible that they have up to 60 days from notification of ineligibility to request a fair hearing. The request for a hearing is defined as a clear expression by the individual, guardian, or other representative that an opportunity to present its case to a higher authority is desired.

If a hearing is requested within the 15 day time period by participants found ineligible at any time during a certification period, benefits will be continued or reinstated until a decision is reached or the certification period expires, whichever occurs first. Applicants, who are denied benefits at initial or subsequent certifications, shall not receive benefits while waiting for the hearing.

Improperly Obtained Benefits

Fraud includes, but is not limited to, the following actions if they are undertaken knowingly, willfully and deceitfully: (1) making false statements orally or in writing in order to obtain benefits to which the individual is not eligible; (2) concealing information in order to obtain benefits to which the individual is not eligible; (3) altering Program documents for the purpose of receiving increased benefits to which the individual is not eligible or for the purpose of transferring benefits to an unauthorized individual; (4) using supplemental foods in an unauthorized manner, such as trading or selling the foods; or (5) committing dual participation.

Appeal rights will be provided at the time of a claim for repayment of the cash value of improperly issued benefits.

Alaska's Family Nutrition Programs will notify, in writing, the person against whom the pursuit of collection of benefits improperly issued is undertaken, of the reasons for the claim, the value of the improperly issued benefits, and of the right to a fair hearing. Any positions or arguments on behalf of the individual may be presented personally or by a representative such as a relative, friend, legal counsel, or other spokesperson.

Restrictions

Participants will not be required to make any payments in money, materials or services for, or in connection with, the receipt of supplemental foods. Also, they will not be solicited in connection with the receipt of supplemental foods for voluntary cash contributions for any purpose.

Distribution of supplemental foods will not be used as a means for furthering the political interest of any person or party.

Provisions for Non-English or Limited-English Speakers

If a significant proportion of the population in an area is comprised of non-English or limited-English speaking participants with a common language, the State agency must ensure that grantee food banks inform these participants of their rights and responsibilities in the program in an appropriate language. State and grantee food banks must ensure that bilingual staff members or interpreters are available to serve these participants.

Service and Caseload Requests

Reference	Citation
247.5 (c) (3)	a description of any plans for requesting program expansion or major redistribution of caseloads within the State during the fiscal year.

Once participants have completed an application and determined eligible to receive CSFP services, they will choose the most convenient service location. Participants may specify a proxy to pick up the CSFP box for them, or choose home delivery if they meet the “homebound” elderly criteria. (See section 247.5 (c) (15) for more information regarding services for homebound elderly).

The participant’s name will be submitted to a master list or computer data base to ensure they have not received CSFP services from another distribution site or grantee food bank. Once determined that the participant is eligible to receive CSFP services for the month, they will sign the master list to acknowledge they have picked up their CSFP box and receive their box from their chosen distribution site. The distribution site will remain for the duration of the certification period, unless the participant specifies otherwise.

Grantee food bank Service Plans

Fairbanks

The Fairbanks Community Food Bank provides direct service as well as servicing other on-site meal programs and other agencies. They do not charge a handling fee for any of their services. They serve grantee food banks as well as individuals using the food bank. In their various direct service programs, they have an intake of 2-5 tons of food each day.

The majority of the food they handle is perishable, and they have a 25,000 square foot building with freezers and refrigeration and appropriate warehouse tools and equipment to handle this volume of daily product. Their volunteer work force is quite stable. They have a separate warehouse for USDA nutrition programs, TEFAP and CSFP. Each day they have volunteers who work on-site. Their CSFP and TEFAP food distribution program is open for business five days each week plus one Saturday each month

Anchorage

The Food Bank of Alaska distributes more than 6.5 million pounds of food or 5.4 million meals, each year to a statewide network of 258 partners. Food Bank of Alaska will fill CSFP individual boxes at its facility in Anchorage, based on actual certifications by its Distribution Agencies. Food Bank of Alaska will take responsibility for the integrity of the program – training and monitoring its partners in CSFP guidelines. Food Bank of Alaska also contracts with the State of Alaska’s Department of Education and Early Development to distribute and monitor TEFAP commodities, SFSP and CACFP federal programs.

The Food Bank of Alaska will fill CSFP individual boxes at its facility in Anchorage, based on actual certifications by its Distribution Agencies. The Food Bank of Alaska will transport the CSFP boxes to these facilities based on their distribution schedules. The Food Bank of Alaska will take responsibility for the integrity of the program – training and monitoring its partners in CSFP guidelines.

Caseload

The Food Bank of Alaska and Fairbanks Community Food Bank will stay within their assigned yearly caseload.

Client Outreach

Reference

Citation

247.5 (c) (4)

A description of plans for conducting outreach to ensure that Elderly persons are aware of program benefits.

7.5 percent of older Alaskans are at risk of hunger, ranking our state 15th in the nation for hunger risk among older adults. Social Security is the primary source of income for 16 percent of people using Alaska’s food distribution network.

Poverty is the leading cause of hunger for seniors; living alone is another risk factor. Unfortunately, the problem is expected to grow as Baby Boomers enter their senior years.

An outreach brochure and poster will be developed to advise potential applicants of program benefits and how to apply (Appendix E). The information will be posted on the Alaska Family Nutrition/WIC Website.

The Grantee Food Banks will provide CSFP information throughout their communities. Other agencies such as senior centers, public health clinics and other health and social service agencies will be provided with information about CSFP.

The Fairbanks Community Food Bank will advertise locally in the Fairbanks daily newspaper and other appropriate media, including radio and television. They will work with their network of referral agencies to facilitate outreach.

The Food Bank of Alaska will work with its network of agencies to spread the word regarding the CSFP program, including personal contact and reminders in the monthly newsletter. The Food Bank of Alaska will feature the CSFP program on its website and reach out to the United Way of Anchorage and the Safe City program of the Municipality of Anchorage. The Food Bank of Alaska will also work to provide media attention for CSFP in conjunction with other programs and promotions.

Outreach activities will be suspended when a waitlist is in effect for a grantee.

Nutrition Education Services

Reference	Citation
247.5 (c) (5)	The plan for nutrition education services for the fiscal year. The nutrition education portion of the State Plan shall include an evaluation component which includes a systematic procedure for participants' input.

Goals

Nutrition education will be based on the following two broad goals:

- To emphasize the relationship of proper nutrition to the total concept of good health with special emphasis on the nutritional needs of the elderly over age 60 and over; and
- To assist seniors in making positive changes in food habits, resulting in improved nutritional status and in the prevention of nutrition related problems through maximum use of the supplemental food packages and other nutritious foods. Nutrition education is to be presented within the context of ethnic, cultural and geographical preferences.

Nutrition Education will include an explanation of the importance of the consumption of the supplemental foods by the participant for whom they are prescribed rather than by other family members; reference to any special nutritional needs of participants and ways to provide adequate diets. An explanation of the Program as a supplemental rather than a total food program; information on the use of the supplemental foods and on the nutritional value of these foods; and an explanation of the importance of health care will also be included

Action Plan

Alaska Family Nutrition Program/WIC will provide nutrition education resources as funding permits. Many other materials are also available free or at low cost from USDA and other sources.

The Fairbanks Community Food Bank is closely aligned with the University of Alaska's Cooperative Extension Expanded Food and Nutrition Education Program (EFNEP) program and uses their services in a variety of ways.

The Food Bank of Alaska will facilitate nutrition education for clients served by the agencies in Anchorage who will be doing distribution. They will expand their current existing connections with University of Alaska's Cooperative Extension as well as other resources.

Evaluation of Nutrition Education

An annual survey will be developed by the grantee food banks to evaluate the effectiveness of nutrition education efforts and participant satisfaction with the CSFP program. The surveys will be administered to participants via the mail, as part of the recertification process, or distributed in boxes. The homebound elderly will be included in the evaluation process. The surveys will be compiled and results tabulated on an annual basis, and sent to Family Nutrition Programs. Technical assistance on developing and implementing the surveys will be the responsibility of a registered dietitian on the staff of the FNP, who will also review and evaluate the results.

Food Distribution

Reference

Citation

247.5 (c) (6)

A detailed description of the manner in which foods are distributed to each grantee food bank and to participants by the grantee food bank.

USDA supplemental foods will be shipped directly from the USDA contracted warehouse to the CSFP grantee food bank warehouses in Anchorage and Fairbanks. The USDA will pay for shipping costs to these two destinations. The State will not directly warehouse or distribute supplemental foods. Grantee food banks will be notified of a commodity shipment.

Actual preparation and distribution/delivery of the food packages will be completed at the grantee food banks as described below. Foods will be packaged in boxes of monthly food allotments, and picked up at approved distribution sites by participants. Staff at the sites will verify recipient eligibility prior to distributing the foods. A picture ID is required to pick up a food box.

Distribution will be on a monthly basis. If a participant becomes ineligible, or does not pick up their box of food by the end of the month, they will be contacted by telephone. If

they cannot be located, the no-show will be sent a written notification (Appendix F). It will state that if they do not pick up a box of food by the end of the 90 day period from original application date, they will be terminated from the program, but they can reapply. This also applies to current participants that do not pick up their boxes two months in a row. The grantee food bank will contact the first applicant on their waiting lists, ensure that they are properly enrolled, and provide them with the food that is not wanted by the “no-show”. If the “no-show” is terminated, the applicant that received the no-show’s box of food will be put in the terminated no-show’s program file.

Boxes of food will be delivered to the homebound elderly, as described in “Services to Elderly Persons”.

Distribution sites, under agreement with the grantee food banks, will assure that adequate care and security is provided for the food while in their possession. Foods will be stored in adequate and secured areas at each distribution site to safeguard them from spoilage, infestation, fire and other losses. These commodities will be included appropriately on monthly FNS 153 inventory reports. These storage areas may also be used to store other USDA commodities or other foods for local use and distribution as long as CSFP boxes are separated and securely stored. Inventory and distribution amounts as well as participant data will be reported to the FNP before additional foods are ordered.

Inventory Control

Grantee food bank staff will be responsible for maintaining a system that will account for all foods received and distributed and for reporting inventory and distribution summaries to the FNP. Commodities must be distributed to participants in a timely manner so items can be used before the Best Used By Date.

Grantee food banks will be required to submit the following reports on a monthly basis:

- An inventory must be completed by each local distribution site and consolidated to an agency-wide inventory report.
- A month-end status report (FNS-153) (Appendix G) that accurately reflects food receipts and distributions for the entire one month period will be submitted to the FNP by the fifteenth day of the following month.
- A month-end status report (FNS-153) will include, as appropriate, inventory of commodities shipped in CSFP packages to sub agencies (partner agencies of grantee food banks)
- An inventory of commodity boxes delivered to sub-agencies and distributed to participants and count of any commodity boxes remaining at sub-agency sites.

Commodity Losses

Loss of USDA food may occur through theft, pilferage, damage, contamination from improper storage and handling, infestation, or spoilage. All losses will be reported to the FNP in writing within 30 days of the loss.

Damage losses detected before or at the time of issuance to participants must be reported. This report will be submitted with the Inventory Status Report at the end of the month.

In the event there are damage losses of more than a few cases of a single product or more than \$100.00, State and USDA approval will be required before the food can be destroyed. Information will be collected concerning large losses and a claim determination made based on the value of the foods lost and evidence of negligence on the part of the grantee food bank. If negligence is involved, further procedures will be determined by the state agency and USDA.

All grantee food banks, distribution sites, warehouse personnel and other individuals will be subject to a claim determination and the corresponding repayment responsibility as a result of the following:

- Improper distribution or use of donated foods.
- Loss of USDA donated food which is caused by neglect, carelessness, and or willful mishandling. "Loss" means any quantity of USDA donated foods that are unaccounted for (including physical count discrepancies) or which have become unusable for human consumption.
- Damage to USDA donated food which is caused by neglect, carelessness, and/or willful mishandling.

Estimating and Maintaining Quarterly Food Needs

Food orders will be based on a comparison of existing products on hand at the grantee food bank against product movement and usage history. Monthly inventory reports will be the primary tool used to evaluate the level of product on hand, and status reports will be used to evaluate product movement and usage. The FNP will work with the grantee food banks to project or anticipate major caseload changes which might result in fluctuating inventory needs while maintaining no more than the USDA FNS standard recommendation of a three (3) month supply of any commodity.

The accuracy and effectiveness of this system will be monitored on an on-going basis, using monthly reports and on-site monitoring to assure that excess product is not accumulating at distribution sites, and that procedures are in place to adjust orders as needed.

Insurance

The State will not be purchasing insurance to protect the value of foods that are to be stored, as there will be no State level storage facility. Commodity foods will be shipped directly to the food banks from the USDA storage facility.

Individual grantee food banks are required to follow the Special Conditions of the Annual CSFP State Grant in part:

An applicant awarded a grant shall maintain sufficient insurance to hold the State harmless and agrees to: the provision of workers' compensation insurance, for which the

policy must waive subrogation against the State; the provision of comprehensive general liability insurance; the provision of liability insurance if automobiles are used for the purpose of this grant program; and the provision of professional liability insurance when applicable to the services performed under the grant.

Grantee food bank Monitoring

Reference	Citation
247.5 (c) (7)	A description of the manner in which the State agency plans to monitor each grantee food bank.

Review of Grantee food bank Operations

The State agency on-going monitoring system includes:

- the monitoring of grantee food bank operations;
- the review of grantee food bank financial and participation reports;
- on-site visits; and
- the development of corrective actions plans to resolve program deficiencies.

On-Site Visits

The state agency conducts monitoring reviews of each grantee food bank once a year using a standard form (Appendix H).

Monitoring of grantee food banks includes:

- Operations
- Certification
- Nutrition Services
- Civil Rights
- Caseload Management
- Financial Management
- Inventory Management
- Food Delivery

The State agency will provide advance notice of an on-site monitoring visit. The on-site visit may be made by a single individual or by a team. Review findings will be discussed with the grantee food bank staff on-site at the end of the review. If the review is done by a team, the team leader will discuss results of the review. A written review report will be sent to the grantee food bank within 30 days of the completion of the review.

Corrective Action Plans

Grantee food banks are required to submit a corrective action plan to redress deficiencies identified during the review by the state agency, within 45 days of receipt of the written report.

The state agency will evaluate the adequacy of the corrective action plan and follow-up with the grantee food bank to ensure corrective action measures are implemented. The state agency will send the grantee food bank written notification of closure of the review.

Grantee food bank Monitoring Standards

A standard review form with performance standards and indicators is used for reviews. Some assessment of performance may be conducted prior to an on-site review, by examination of grantee food bank financial reports, computer data sent to the State agency, and similar records.

Partnerships and Development of the State Plan

Reference

Citation

247.5 (c) (8)

A description of plans to involve grantee food banks, participants and other interested parties in the development of the State Plan for the next fiscal year.

Grantee food banks are provided a copy of the approved State plan annually and are encouraged to provide input and ideas on an on-going basis for consideration into subsequent State plans.

System of Financial Management

Reference

Citation

247.5 (c) (9)

A description of how the financial management system will provide an accurate, current and complete disclosure of the financial status of the State's Program including an accurate accounting of all administrative funds received and expended.

Funds are made available to each of the local CSFP agencies through grants by the State of Alaska Department of Health and Social Services. The grants specify the services to be performed according to federal regulations and the State plan of operation. Unique financial coding established in the financial structure of the Alaska Statewide Accounting System is recognized as CSFP. This assignment of financial coding unique to the CSFP allows the State agency accounting staff to accurately record, monitor and identify CSFP funds, receipts, expenditures and outstanding obligations. Financial data is used for CSFP program development and monitoring, management of funds, reporting purposes and grant reconciliation.

The State agency staff determines administrative and grant funding allocations necessary for successful program administration within the limitations of the USDA grant.

The State agency

- Ensures adequate funds are available to meet program administrative and support grantee needs.
- Prepares financial documents required to establish grantee food bank grants.
- Prepares purchasing documents for administrative requirements and disburses funds through the account payable process.
- reviews all account payable documents for completeness and accuracy;
- verifies receipt of services or commodities;
- ensures allowable payments are processed correctly and timely; and
- Initiates correcting adjusting entries in the State accounting system should they be required.

The State agency finance staff generates reports of financial data monthly and reviews all financial data against the CSFP grant to ensure all activity is allowable under the program (Appendix I). The State agency staff ensures the quality and timeliness of financial data reported to USDA, FNS. The State agency staff retrieves applicable financial activity from the State accounting system, prepares and submits required financial reports, responds to questions concerning the data, and maintains adequate documentation to support the reported data.

Dual Participation

Reference

Citation

247.5 (c) (10) A plan for the detection of dual participation within the jurisdiction of the State agency.

Dual participation will be defined as the simultaneous participation in more than one Alaska CSFP Program.

On a monthly basis, each of the two CSFP grantee food banks will transmit a listing of names and addresses of all newly certified CSFP participants to the other agency. Agency staff will check these names and addresses against the roster of those currently enrolled in their CSFP Program, to detect any instance of dual participation on a monthly basis.

Participants found to be dual participants will be terminated from one or both programs, and be informed of their right to a Fair Hearing.

All participant names and addresses will be kept in confidential files, accessible only to staff who are responsible for the detection of dual participation.

There is a great geographical distance between the two Food Bank grantees. Outlying distributing agencies are assigned to a particular grantee.

Computer programs for each grantee eliminate the possibility of dual participation for each grantee.

Procedures for Resolving Complaints

Reference	Citation
247.5 (c) (11)	Procedures developed in accordance with §250.6 (u) and provided to grantee food banks for reporting, processing and resolving complaints about supplemental foods.

During certification all participants and potential participants are informed of their rights and obligations. Participants will be advised of the policy of nondiscrimination and the procedure for filing a complaint if they believe they have been discriminated against.

Depending on the nature of the complaint, food or services, the problem will be promptly investigated by the grantee food bank and the person making the complaint will be notified of the results in writing. All persons making complaints must be notified of their right to a fair hearing so they may take further steps should their complaint not be satisfactorily resolved.

Complaints or concerns of a potential health hazard will be immediately reported to the State agency by the grantee food bank. The State will refer the matter to the appropriate other State agencies and the U.S. Department of Agriculture.

The distributing agency, in cooperation with the grantee food bank, will investigate promptly complaints received in connection with the distribution of donated foods, correct any irregularity, and inform the local and state agencies

Audit Procedures

Reference	Citation
247.5 (c) (12)	A description of the audit procedures, including: <ul style="list-style-type: none"> (i) A description of the scope and frequency of audits of the State agency and grantee food banks and a delineation of the procedures used that assure audit examinations of the SCF Program at reasonable frequency. Audit agency guidelines for selecting a sample of grant programs for audits should be addressed; (iii) a description of the audit organization in sufficient detail to demonstrate the independence of the audit organization; and (iii) the number of grantee food banks in which the CSFP was included in the audit in the last four full quarters, and the number of grantee food bank audits planned for the

coming fiscal year which include examinations of the CSFP.

The Alaska State Legislative Affairs Agency conducts separate, annual audits of the State's management of the CSFP that include reviewing documents and procedures applicable to financial operations.

Nondiscrimination and Civil Rights

Reference	Citation
247.5 (a) (13)	A description of the procedures used to comply with the nondiscrimination requirements of title VI of the Civil Rights Act of 1964, the FNS Civil Rights Instruction 113-2 and with 7 CFR part 15, including racial and ethnic participation data collection, public notification procedures and the annual civil rights compliance review process.

Civil Rights

Grantee food banks are required to protect participants' civil rights. They must:

- Ensure that participation in the program is free from any exclusion based on race, color, national origin, age, sex or handicap.
- Provide CSFP services without any difference in quality, quantity, or manner in which CSFP benefits are provided.
- Issue CSFP services and benefits in a place, time, or manner that does not result in, or does not have the effect of denying or limiting the benefits on the basis or race, color or national origin.
- Provide CSFP services without segregating persons in waiting areas or through appointment systems.
- Apply the same eligibility criteria to all potentially eligible clients applying for the program.
- Maintain a waiting list that makes no distinction on the basis or race, color, or national origin.

Public Notification

The State agency takes positive and specific actions to assist grantee food banks to implement a public notification program which encourages participation and informs all potential participants, particularly minorities, of the availability of the program. The public notification system must include advising applicants and participants of the protection against discrimination, and provide the procedure for filing a complaint.

Grantee food banks are required to:

1. Develop and implement outreach Activities that inform minorities or those with disabilities of the CSFP and services.
2. Display the nondiscrimination poster, “And Justice for All,” in prominent places, such as waiting areas and other facilities frequented by participants (Appendix K).
3. Advise participants verbally and in writing to file complaints of discrimination with the USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW, Washington D.C. 20250-9410, or call (202) 720-56-5964 (voice and TDD).
4. Upon request, provide participants, and potential participants, access to Civil Rights materials. Materials must include the procedures for filing complaints, program specifics, and rights of participants and applicants.
5. Use the Nondiscrimination Statement below, and use it, in full, on any public notification information the grantee food bank sends out for the purpose of public information, public education, or public distribution.

“In accordance with Federal law and U.S. Department of Agriculture policy, the Commodity Supplemental Foods Program is prohibited from discrimination on the basis of race, color, nation origin, sex, age, disability, or religion.

To file a complaint of discrimination, write the USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW, Washington D.C. 20250-9410, or call (202) 720-56-5964 (voice and TDD). USDA is an equal opportunity provider and employer.”

If the material is too small to permit the full statement to be included, the material will at the minimum include the statement, in print no smaller than the rest that states: **“The Commodity Supplemental Foods Program is an equal opportunity provider.”**

Civil Rights Training

New grantee food bank staff must be briefed on civil rights rules during orientation. The grantee food bank director or designee must provide a Civil Rights in-service class to all grantee food bank staff once a year. During this training session the grantee food bank director must review civil rights materials including:

- Protecting participants’ civil rights
- Public notification
- Discrimination complaint procedures
- Racial-ethnic reporting.

The grantee food bank director must document in an agency service file:

- Names of staff in attendance

- Brief summary of information provided.

Racial and Ethnic Participation Data Collection

Grantee food banks must report actual participation data by racial/ethnic category for each clinic, by recording this information in the CSFP computer system. Self-declaration is used to determine a participant's racial/ethnic category. Participants must not be required to declare a racial/ethnic category as a condition of program participation. If questioned, grantee food bank staff must explain to applicants and participants that the collection of racial/ethnic identity information is strictly for statistical requirements only and has no effect on the determination of their eligibility in the CSFP.

Provisions for Non-English or Limited-English Speakers

If a significant proportion of the population in an area is comprised of non-English or limited-English speaking participants with a common language, the State agency must ensure that grantee food banks provide other program information, except application forms, to these participants in their appropriate language.

Self Identification

If a participant declines to provide this information, FNS 113-2, Section III A state that "visual identification shall be used to determine a participant's racial/ethnic category". If the CSFP applicant chooses not to self-identify, CSFP staff must visually identify to determine the participant's racial ethnic category. CSFP staff must include the participant in the group which he/she appear to belong or identifies with.

Fair Hearing Procedures for Participants

Reference	Citation
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247.5 (a) (14)	A description of the fair hearing procedures for participants.
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Each program applicant or participant will be informed in writing of their right to a fair hearing at initial and subsequent certifications. This will be part of the State approved application form, which the applicant will sign. It will include the following:

"I understand that no person may be denied assistance on the basis of race, color, sex, age, handicap, religion, national origin or political belief. I understand that any one listed in my household CANNOT be enrolled in the WIC and CSFP at the same time. I CANNOT receive CSFP benefits more than one time per month, and I CANNOT sell or trade commodities or use someone else's commodities for my household. I am aware that the information gathered may be shared with other organizations to detect and prevent dual participation. I also agree to inform the CSFP Program if my household income or composition changes. I will provide the new information within 15 days of the change.

I understand that if I have not picked up your commodity foods for two consecutive months, I will be considered “inactive”. If I choose to remain a participant in the CSFP, I must notify the agency or participate within 90 days of the original application date. Failure to contact the grantee food bank or participate in CSFP within 90 days from the date on this application will result in removal from the program. Participants who are removed from the program because of an “inactive” status are allowed to reapply for benefits. If a waiting list exists, your application must be placed on the list on the date it was received.

If you disagree with the denial or termination of assistance, you can request a Fair Hearing within sixty (60) days of the decision, by contacting State of Alaska Family Nutrition Programs. A request for a Fair Hearing shall be personally presented, either orally or in writing. A request for an informal review must include: 1) Name, address and contact phone number, 2) the reason for the grievance, 3) the action or relief sought; and 4) signature of applicant or representative.

A Hearing Officer will arrange a date, time and place convenient to both you and HSS FNP. In preparing for the hearing you have the right to examine any documents, including records and regulations that are directly relevant to the hearing. You have the right to be represented by counsel or any other person chosen as your representative. You have the right to a private hearing unless you request a public hearing. You have the right to present evidence and arguments in support of your grievance and to controvert evidence. You also have the right to cross-examine all witnesses. The Hearing must render a decision within (14) days of the hearing. The decision of the Hearing Officer will be final.

I have been advised of my rights and responsibilities under the program. I certify that the information I have provided for my eligibility determination is correct to the best of my knowledge. I authorize the release of information provided on this application form to other organizations administering assistance programs for use in determining my eligibility for participation in other public assistance programs and for program outreach purposes. I acknowledge that I have received information outlining my rights to request a Fair Hearing if my application is unjustly denied. I further understand that I must request a hearing within 60 days of the written date of denial. “

Grantee food banks will notify Individuals of their eligibility or ineligibility for the program within 10 days of the application date. A copy of this application form will be retained by the grantee food bank. Any individual found ineligible at any time during a certification period will also be notified. The participant will be notified a minimum of 15 days prior to termination of program benefits. They will also be informed of their right to a fair hearing at that time.

Each participant will also be notified at least 15 days prior to expiration of their certification period that the period is about to end. Grantee food banks, at the time of application or when notifying a person found ineligible of their right to a fair hearing, will advise the individual of the method of requesting a hearing and their right to be represented at the hearing by a friend, legal advisor, or other representative of their choice, and give them a summary of the hearing process.

Grantee food banks will advise those found ineligible that they have up to 60 days from notification of ineligibility to request a fair hearing. The request for a hearing is defined as a clear expression by the individual, guardian, or other representative that an opportunity to present its case to a higher authority is desired.

If a hearing is requested within the 15 day time period by participants found ineligible at any time during a certification period, benefits will be continued or reinstated until a decision is reached or the certification period expires, whichever occurs first. Applicants, who are denied benefits at initial or subsequent certifications, shall not receive benefits while waiting for the hearing.

Services to Elderly Persons

Reference

Citation

247.5 (a) (15)

A description of the plans for providing program benefits to elderly persons within the State during the caseload cycle. Such description shall include an identification of the elderly population to be served, including documentation of the extent of need in the proposed service area.

A description of how the State agency will meet the needs of the homebound elderly.

The two grantee food banks currently work cooperatively with local agencies providing services to the elderly in their communities. CSFP is part of these on-going activities.

Homebound Elderly

The homebound elderly will be defined as individuals 60 years and older unable to apply for program benefits and/or pick up their own CSFP foods due to medical conditions, lack of a valid driver's license or a restricted driver's license preventing transportation to the distribution site.

The two grantee food banks will coordinate with the local Meals on Wheels programs as well as the Salvation Army to provide the homebound elderly with information about the CSFP Program, conduct home certifications and delivery of food packages. Information will include the phone numbers and names of grantee food bank staff that will be

available to answer questions about the CSFP Program or provide information on delivery schedules.

A spouse, relative or caretaker of the elderly applicant may apply on their behalf if the applicant is homebound or for any reason unable to apply on his/her own behalf, and may pick up food packages on their behalf. The CSFP staff must be assured that the elderly individual does exist. A home visit or a telephone conversation with the elderly individual must occur unless staff has knowledge that the elderly applicant is alive and not living in a nursing home.

If volunteers are used to take applications at the homes of homebound elderly, the actual certification will be done by grantee food bank staff. Delivery receipts will be issued with each food package. It will be signed by each homebound recipient, verifying that the food package was delivered to them. Volunteers at the community levels will offer information about the CSFP to seniors and elders at congregate meal sites, senior information agencies and through newsletters.

Transportation costs to ship and/or deliver food boxes to senior clients are a continuing challenge. To that end, the State and grantee food banks will explore grants for costs of transportation through local Alaska foundations, Nutrition, Transportation, and Support Service grants through the Division of Senior Services as well as the Alaska Mental Health Trust Authority and local Tribal entities.

Appendix A

Draft Contractual Agreement: Operation of USDA Commodity Supplemental Food Program State of Alaska Family Nutrition Programs and Food Bank of Alaska / Fairbanks Community Food Bank

I. PURPOSE

The State of Alaska Family Nutrition Programs (herein referred to as the State), contracts with the non-profit organizations (herein referred to as grantee food bank) to operate the Commodity Supplemental Food Program (herein referred to as the Program), according to federal regulation 7CFR Part 247 and State and Department policies and procedures to:

- 1.) Provide commodity food packages to low-income pregnant women, postpartum women, breastfeeding women, infants, children up to age 6, that are phasing out of the program and elderly persons age 60 and over, to enhance nutrition for these vulnerable Alaskans.
- 2.) Manage the Program and funds accountably and appropriately to achieve the desired standards and outcomes of the Program, which includes the improved health of low-income pregnant and breastfeeding women, other new mothers up to one year postpartum, infants, children up to their 6th birthday, and older persons at least 60 years of age by supplementing their diets with nutritious commodity foods.
- 3.) Manage the commodity foods received effectively and efficiently to avoid spoilage and waste.

II. DEFINITIONS

1. Administrative costs: those direct and indirect costs which the Department and Contractors determine to be necessary to support Program operations.
2. Caseload: monthly average number of persons a Contractor is authorized to serve over a specified period of time.
3. Certification: the use of criteria and procedures to assess and document each applicant's eligibility for the Program.
4. Grantee: a public or private nonprofit agency, which enters into an agreement with the state agency to administer the Program at the local level. A grantee food bank determines the eligibility of applicants; distributes supplemental food and provides nutrition education to low-income persons, either directly or through another agency with which it has entered into a written agreement.

5. Distributing agency: a sub-contracting agency, which has entered into an agreement with a grantee food bank for the distribution of commodities.
6. Dual participation: simultaneous participation by an individual in the CSFP in more than one Grantee food bank or clinic, or simultaneous participation in the CSFP and in the Special Supplemental Nutrition Program for Women, Infant and Children (WIC).
7. Elderly persons: persons 60 years of age and older.
8. Homebound elderly persons: persons who are, in the judgment of the grantee food bank unable to obtain monthly food packages without assistance provided by or through the grantee food bank.
9. Nonprofit agency: a private agency, which is exempt from income tax under the Internal Revenue Code of 1954, as amended.
10. Participants: elderly persons who are receiving supplemental foods under the Program.
11. Participation: the number of person who have received supplemental foods through the Program in the reporting period.
12. State agency: the Alaska Department of Health and Social Services, Office of Children's Services, Family Nutrition Programs.
13. Supplemental foods: food donated by the U.S. Department of Agriculture for use by eligible persons in low-income groups who are vulnerable to malnutrition.

III. GRANTEE FOOD BANK RESPONSIBILITIES

General: The Grantee food bank shall comply with all fiscal and operation requirements prescribed by the Department and the federal regulations 7CFR Part 247.

The grantee food bank shall:

1. Provide adequate personnel and facilities for the receipt, storage and distribution of CSFP commodities.
2. Maintain timely accurate and complete records to account for the receipt, storage, and distribution of CSFP commodities.
3. Provide an assurance that nutrition education will be provided as available by the State.
4. Advise participants of the importance of health care and provide appropriate referral to obtain such care.
5. Provide assurance that issuance of commodity food is in accordance with FNS food package instructions.
6. Accept responsibility for any loss of commodity foods resulting from improper or negligent issuance of prescriptions for supplemental foods.

7. Accept responsibility for any Program losses caused by other agencies, which have entered into an agreement with the State.
8. Provide the names and address of each certification, food distribution and storage site under the jurisdiction of the State.
9. Maintain accurate and complete records with respect to activities under the Program and retain such records for a period of three years following the date of submission of the final expenditure report for the period to which the report pertains.
10. Enter into a written agreement with another agency(s), if the agency cannot fulfill one or more of these requirements. The written agreement shall:
 - a. Be submitted with the grantee food bank's application for participation in the CSFP.
 - b. State the Program responsibilities of the other agency.
 - c. Be approved by the State.
 - d. Be on file with both the Grantee food bank and the State.
11. Have available to conduct a fair hearing, an impartial official who does not have any personal stake or involvement in the decision and who was not directly involved in the initial determination of the action being contested.

IV. CERTIFICATION

The State shall certify each applicant prior to the issuance of program benefits. Each applicant shall meet the following requirements:

1. Eligible as an elderly person;
2. Meet residency requirements as defined in State CSFP plan of operation,
3. For elderly persons, household income at or below 130% of federal poverty income guidelines.
 - a. The Grantee food bank shall maintain a waiting list of individuals who apply for the Program on-site when funding is not available to provide Program benefits.
4. All certification data for each participant shall be recorded on a certification form provided by the Department.
5. The following sentences shall be read by, or read to, the applicant or the applicant's parent or caretaker, in the appropriate translation, at the time of certification:
 - Standards for participation in the program are the same for everyone regardless of race, color, age, sex, disability, or national origin.

- You may appeal any decision made by the Contractor regarding your denial or termination from the Program.
 - If your application is approved, the Contractor will make nutrition education available to you and you are encouraged to participate.
 - It is illegal to participate in the CSFP with more than one grantee food bank. A person found ineligible for the CSFP during a certification visit shall be advised in writing of the ineligibility and of the right to a fair hearing.
 - A person found ineligible at any time during the certification period shall be advised in writing 15 days before termination of eligibility of the reasons for ineligibility and of the right to fair hearing.
 - Each participant shall be notified at least 15 days before the expiration of each certification period that eligibility for the Program is about to expire.
6. Each participant shall receive an explanation of how the CSFP food delivery system in the Grantee food bank's agency operates.
 7. Each participant shall be advised of the importance of participating in on-going routine health care, the types of health care services available, where they are located and how they may be obtained.
 8. Certifications shall be established in accordance with the following time frames:
 - a. Elderly persons shall be certified at intervals of six months.

V. NUTRITION EDUCATION

1. Nutrition education shall be thoroughly integrated into Program operations. The State shall make nutrition education available to all adult participants as funding allows. The State shall include the following subject matter in the instructions given to participants:
 - a. The importance of the consumption of the supplemental foods by the participant for whom they are prescribed rather than other family members.
 - b. Reference to any special nutrition needs of participants and ways to provide adequate diets;
 - c. An explanation of the Program as a supplemental food program;
 - d. Information on the use of the supplemental foods and on the nutritional value of the foods;
 - e. An explanation of the importance of health care.

2. The State or local agency, or another agency with which it has signed an agreement, may use CSFP foods to conduct cooking demonstrations as part of the nutrition education provided to program participants, but not for other purposes.
3. Commodity foods may not be used for outreach, refreshments for participants, or any other such purpose.

VI. FINANCIAL MANAGEMENT:

1. The Grantee food bank shall maintain complete, accurate, documented and current accounting of all grant funds received and expended.
2. The grant caseload and amount for operational funds is based on the availability of federal funds, which is subject to change. The Department shall provide thirty (30) days written notice to the Contractor prior to an effective change.
3. The Grantee food bank shall be reimbursed for necessary and allowable costs incurred specifically for the proper and efficient performance of the contract, or a specific amount for each client served, whichever is less, as outlined in OMB Circular A-122 and the Program regulations. Allowable costs for the contract include personnel compensation and benefits, conference and training, travel, equipment, nutrition education materials, transportation costs, administrative office costs, facility costs and indirect costs. Indirect costs are those costs incurred for common or joint purposes benefiting more than one activity and not readily identifiable to a particular program or activity.
4. The Grantee food bank shall report any food losses totaling over \$100.00 to the State within 30 days on the FNS-153 reporting form of such losses being noted. The State and/or USDA will determine when and if a claim shall be assessed.

VII. RECORD KEEPING REQUIREMENTS

1. The Grantee food bank shall maintain accurate and complete records with respect to the receipt, disposal and inventory of supplemental foods, including the determination made as to liability for any improper distribution or use of, or loss of, or damage to, such food.
2. Accurate and complete records shall be maintained with respect to the receipt and use of administrative funds.
3. All records shall be retained for a period of three years following the date of submission of the annual financial status report for the period to which the reports pertain.

4. All records shall be available during normal business hours for representatives of the Department, U.S. Department of Agriculture-Food and Nutrition Service, and the General Accounting Office of the United States to inspect, audit, and copy.

VIII. CIVIL RIGHTS

1. The Grantee food bank and any subcontractor shall assure the State that it will comply with Title VI of the Civil Rights Act of 1964 (P.L 88-352) and all requirements imposed by the Regulations of the Department of Agriculture (7 CFR Part 15), Department of Justice (28 CFR Parts 42 and 50) and Food and Nutrition Service directives and regulations issued pursuant to that Act and the regulation, to the effect that no person in the United States shall, on the grounds of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied benefits of, or be otherwise subject to discrimination under any Program activity for which the Contractor received Federal financial assistance from the Department; and will immediately take any measures necessary to effectuate this agreement.
2. By accepting this assurance, the Grantee food bank agrees to compile data, maintain records and submit reports as required, to permit effective enforcement of Title VI and permit authorized personnel during normal working hours to review such records, books, and accounts as needed to ascertain compliance with Title VI. If there are any violations of this assurance, the State shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Grantee food bank, its successors, transferees, and assignees as long as it receives assistance or retains possession of any assistance from the State. The person or persons whose signature appears on the contract are authorized to sign this assurance on behalf of the Grantee food bank.

IV. LEGAL COMPLIANCE

1. The Grantee food bank and any subcontractor shall comply with all federal and state laws applicable to this Program, including the Agriculture and Consumer Protection Act of 1973, Sections 4 (a) and 5, as amended, Public Law 93-86, 7 U.S.C. 612 (c) (note); the Food and Agriculture Act of 1977, as amended, Public Law 95-113, 91 Stat. 980; Public Law 97-098, 95 Stat. 1293; Public Law 98-8, 97 Stat. 35; Public Law 98-92, 97 Stat. 611; Public Law 99-198, 99 Stat. 1590; Public Law 101-624, 104 Stat. 3806; Public Law 104-127, 110 Stat. 888; 7 C.F.R. 247 and the Commodity Supplemental Food Program State Plan Guidance issued by the USDA.

V. RETURN OF THE PROPOSED CONTRACT

1. Return of the proposed contract within forty-five (45) calendar days of the date mailed by the State is necessary to ensure execution of this contract by the State.

VI. DEPARTMENT RESPONSIBILITIES

1. Pay all approved administrative expenses submitted by the grantee food bank based on actual costs incurred or based on allowable per caseload administrative rates, whichever cost is less.
2. Monitor Program operations in accordance with Program regulations. Unannounced visits may be made at any time during the Grantee food bank's normal hours of operations.
3. Make adjustment to administrative claims, as needed, when the Grantee food bank fails to comply with Program regulations.
4. Assure appropriate action to correct Grantee food bank's deficiencies in Program operations. This contract will be terminated if serious deficiencies are not corrected by the Grantee food bank in a reasonable time frame in accordance with Program regulations.
5. In accordance with Program regulations, the Grantee food bank has the right to appeal actions taken by the State that deny all or part of an administrative claim, or suspend or terminate this contract.
6. Billing and Refunds: if the Grantee food bank was overpaid by the State, the overpayment will be recovered by the Department from future payments owed the Grantee food bank. The amount to be recovered on a monthly basis will be detailed in correspondence with the Grantee food bank and will meet requirements stipulated in the regulations and other applicable Federal guidance. In the event that the contract is terminated, the Grantee food bank will issue a check for the amount of the overpayment made payable to "Department of Health and Social Services; Division of Public Assistance, Family Nutrition Programs" within 10 days of official notification of the Department and will mail the payment to:

Alaska Department of Health and Social Services
Family Nutrition Programs
P.O. Box 110612
Juneau, AK 99811

7. The State reserves the right to deny reimbursements on costs submitted more than 60 days after the due date. If a request by the Grantee food bank for reimbursement is denied, the State shall provide the Grantee food bank with written notice of the reason(s) for denial.

8. The State reserves the right to reallocate caseload and operational funds at any time based on documented cumulative caseload served.
9. The State reserves the right to renew this contract for up to two additional contract periods, based on the availability of federal funds and on contractor performance. The renewal period for each extension shall be October 1 through September 30.

DRAFT

Appendix B Anchorage Sites

CSFP Agencies in Name Order
Active agencies only -- printed September 11, 2014

<i>Agency Name</i>	<i>No.</i>	<i>Agency Code</i>	<i>Group</i>	<i>Master</i>	<i>Census district</i>
AnchorAge Senior Center	9082A	ASC		ANC	Anchorage
Chugiak Senior Citizens Center	9606A	CSCC		ANC	Anchorage
CIHA - Chickaloon Landing	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Ekultna Estates	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Kenaitze Pointe	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Knick Corners	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Salamatof Heights A	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Salamatof Heights B	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Salamatof Heights C	9069A	CIHA	CIHA	ANC	Anchorage
CIHA - Tyonek Terrace	9069A	CIHA	CIHA	ANC	Anchorage
Copper River Native Association	9241A	CRNA			Valdez-Cordova
Kenai Peninsula Food Bank - Homer Comm. Food Pantry	9092A	KPFB - HCFP	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - Kenai Senior Center	9092A	KPFB - KSC	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - KP Food Bank	9092A	KPFB	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - Nikiski Senior Center	9092A	KPFB-NSC	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - Ninilchik Senior Center	9092A	KPFB-NKSC	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - Soldotna Senior Center	9092A	KPFB - SSC	KPFB	KEN	Kenai Peninsula
Kenai Peninsula Food Bank - Sterling Senior Center	9092A	KPFB - StSC	KPFB	KEN	Kenai Peninsula
Kodiak Island Food Bank	9324A	KIFB			Kodiak Island
Latino Lions Club	9117A	LL		ANC	Anchorage
Lutheran Social Services	9041A	LSS		ANC	Anchorage
Mid-Valley Seniors, Inc.	9040	MVS		MAT	Matanuska-Susitna
Palmer Food Bank	9101A	PFB		MAT	Matanuska-Susitna
Salvation Army MatSu Valley Corps - Palmer	9088A	SA MAT - P		MAT	Matanuska-Susitna
Salvation Army OAP - Chugach Manor	9053A	SA OAP - CM	SA OAP	ANC	Anchorage
Salvation Army OAP - Chugach View	9053A	SA OAP - CV	SA OAP	ANC	Anchorage
Salvation Army OAP - Delivery	9053B	SA OAP-D	SA OAP	ANC	Anchorage
Salvation Army OAP - Downtown	9053A	SA OAP - DT	SA OAP	ANC	Anchorage
Southcentral Foundation Elders Program	9208A	SCF EP		ANC	Anchorage
St. Francis House (Catholic Social Services)	9084A	SFH		ANC	Anchorage
Upper Susitna Food Pantry - Sunshine	9179B	USFP - S	USFP	MAT	Matanuska-Susitna
Upper Susitna Food Pantry - Trapper Creek	9179B	USFP - TC	USFP	MAT	Matanuska-Susitna
Wasilla Area Seniors	9105A	WAS		MAT	Matanuska-Susitna
Willow Community Food Pantry	9605	WUMC		MAT	Matanuska-Susitna
Wrangell SDA Church	9485	WSDA			Sitka

Appendix C- Fairbanks Sites

The Fairbanks Community Food Bank warehouses commodity foods shipped directly to it from USDA, and packages foods into individual monthly allotments. It will directly distribute foods to certified program participants; and the following agencies for distribution:

Site	City	Site	City
Deltana Community Partnership	Delta Junction	The following sites from Maniilaq will be deleted as of 9/30 because of transportation issues. It is hoped funding will be found in the near future	
MLH Manor / Anthony Petkevs	Fairbanks	Ambler Maniilaq Tribal	Ambler
Salvation Army	Fairbanks	Buckland Maniilaq Tribal	Buckland
Santa Seniors Center	North Pole	Deering Maniilaq Tribal	Deering
Tanana Chiefs Conference		Kiana Maniilaq Tribal	Kiana
Alatna Tribal Council	Alatna	Kivalina Maniilaq Tribal	Kivalina
Allakaket Tribal Council	Allakaket	Kobuk Maniilaq Tribal	Kobuk
Arctic Village Council Office	Arctic Village	Kotzebue Maniilaq Tribal	Kotzebue
Beaver Tribal Council	Beaver	Noatak Maniilaq Tribal	Noatak
Birch Creek Tribal Council	Fort Yukon	Noorvik Maniilaq Tribal	Noorvik
Chalkyitsik Village Council	Chalkyitsik	Selawik Maniilaq Tribal	Selawik
Eagle Traditional Council	Eagle	Shungnak Maniilaq Tribal	Shungnak
c/o Evansville Tribal Council	Evansville		
Galena Loudon Tribal Council	Galena		
Gwichyaa Zhee Gwich'in Tribal Government	Ft. Yukon		
Holy Cross Traditional Council	Holy Cross		
Hughes Village Council	Hughes		
Kaltag Tribal Council	Kaltag		
Koyukuk Tribal Council	Koyukuk		
McGrath Village Council	McGrath		
Nikolai Gdzene Village Council	Nikolai		
Nulato Tribal Council	Nulato		
Ruby Tribal Council	Ruby		
Shageluk IRA Council	Shageluk		
Tanana Village Council	Tanana		
Venetie Traditional Council	Venetie		
Yukon Kuskokwim			
Huslia Cooks Office	Husulia		

Before signing, know your rights and responsibilities under the Commodity Supplemental Food Program (CSFP). By checking the "yes" box next to the statements listed below, I am saying that I understand:

- This application is being completed in connection with the receipt of Federal assistance. Program officials may verify information on this form. I am aware that deliberate misrepresentation may subject me to prosecution under applicable State and Federal statutes. Improper use of benefits due to dual participation or other program violations may lead to recovering value of benefits and program disqualification ☐ yes
☐ no
- Furthermore, I am aware that the information provided may be shared with other organizations to detect and prevent dual participation. I have been advised of my rights and obligations under the program. I certify that the information I have provided for my eligibility determination is correct to the best of my knowledge. ☐ yes
☐ no
- I authorize the release of information provided on this application form to other organizations administering assistance programs for use in determining my eligibility for participation in other public assistance programs and for program outreach purposes. ☐ yes
☐ no
- Standards for CSFP are the same for everyone regardless of race, color, national origin, sex, age, disability, or political belief. To file a complaint of discrimination, write: USDA, Director; Office of Civil Rights; Room 326-W, Whitten Building; 1400 Independence Avenue, S.W.; Washington D.C. 20228; (202)750-9410 or call (202) 720-5964 (Voice and TDD). USDA is an equal opportunity provider and employer. ☐ yes
☐ no
- I CANNOT trade/sell CSFP food or purchase /use someone else's CSFP food for my household. ☐ yes
☐ no
- I agree to inform the CSFP partner agency within 10 days of any changes in my contact information (i.e., my home address or phone number), my income, or my household composition. ☐ yes
☐ no
- If I do not pick up my commodity foods for two months in a row, I may be considered an "inactive" CSFP participant and removed from the program. If I choose to remain a participant in CSFP, I must notify the CSFP partner agency and participate within the current certification period of my original application date. ☐ yes
☐ no
- CSFP recipients who are removed from the program for being "inactive participants" are allowed to re-apply for benefits by filling out another CSFP application. If a waiting list exists, however, I understand my application will go on the list according to the date it was received. ☐ yes
☐ no
- I must fill out a new CSFP application once a year. Every 6 months, you will need to verify your address, income and your interest in continuing with the program. ☐ yes
☐ no

If you disagree with the denial or termination of assistance, you can request a Fair Hearing within sixty (60) days of the decision, by contacting State of Alaska Family Nutrition Programs at 130 Seward Street, Room 508, Juneau, Alaska 99801; or call 907 465-3100. A request for a Fair Hearing shall be personally presented, either orally or in writing. A request for an informal review must include: 1) name, address and contact phone number, 2) the reason for the grievance, 3) the action or relief sought, and 4) signature of applicant or representative. A Hearing Officer will arrange a date, time and place convenient to both you and Family Nutrition Programs. In preparing for the hearing you have the right to examine any documents, including records and regulations that are directly relevant to the hearing. You have the right to be represented by counsel or any other person chosen as your representative. You have the right to a private hearing unless you request a public hearing. You have the right to present evidence and arguments in support of your grievance and to controvert evidence. You also have the right to cross-examine all witnesses. The Hearing Officer must render a decision within (14) days of the hearing. The decision of the Hearing Officer will be final.

APPLICANT or GUARDIAN _____ Date _____
Signature

Printed Name of Applicant or Parent/Guardian: _____

My approved alternate(s) (full name): _____
If you would like to give permission for someone to pick up food on your behalf, please name them here.

CSFP Agency Use Only: If an application is signed by someone other than the applicant. CSFP regulations require CSFP agencies to see Power of Attorney paperwork. Power of Attorney paperwork reviewed by the Certifying Official? ☐ yes ☐ no
Certifying Official's Initials _____

Appendix E**Alaska CSFP Outreach Notice****What is CSFP?**

The Commodity Supplemental Food Program (CSFP) provides nutritious commodity foods to older adults who live in low-income households.

A food package consisting of canned fruits, vegetables and meats; cheese, cereals, peanut butter, grain products and milk products, is provided to each eligible individual each month.

Who can receive a food package?

- ✓ **Older adults, age 60 and above**

Who and what is low income?

Elderly adults must have income below 130% of the federal poverty level.

What do I need to bring to sign up?

- – information about age, mailing and residential address, and annual income.

Where do I go?

- In the **Anchorage** area, call Food Bank of Alaska **907.272.3663**
- In the **Fairbanks** area, call Fairbanks Community Food Bank **907.374.0555**

In accordance with Federal law and U S Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D C 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provide and employer.

Appendix F**CSFP Participation Status Letter**

CSFP Grantee food bank and Distribution Site: _____

Place agency sticker here

REGARDING PARTICIPANT:

NAME _____ DATE: _____

ADDRESS: _____

PHONE: _____

This letter is to inform you that you have not picked up your commodity foods for two consecutive months and are now a “no show”. If you choose to remain a participant in the Commodity Supplemental Foods Program, you must contact the grantee food bank within 15 days from the date on this notice.

Failure to contact the grantee food bank within 15 days from the date on this notice will result in removal from the program. Participants who are removed from the program because of a “no-show” status are allowed to reapply for benefits. If a waiting list exists, your application must be placed on the list by category on the date it was received.

You have a right to request a Fair Hearing if you do not agree with the action taken. You must request a hearing within 60 days from the date this notice is mailed. If you have been determined to be ineligible for CSFP participation, you may appeal within 60 days of the date this notice is mailed. If a hearing is not requested, your benefits will be reduced or terminated accordingly.

If you request a Fair Hearing, you may continue to receive benefits until a hearing decision has been made, unless you have been determined to be ineligible for the CSFP. If the Grantee food bank is upheld in its decision, a claim against the household shall be established for all over-issuance of USDA foods.

If you want to request a Fair Hearing, return this portion of the letter to your Food Distribution site.

NAME: _____ TODAY'S DATE _____

ADDRESS: _____

PHONE NUMBER: _____

Appendix G**CSFP Budget Allowances****I. PERSONAL SERVICES**

Allowable cost categories for use of grant funds or grant income for a grant project budget include:

1. Salaries & Wages: Regular and overtime salaries and wages for project staff, temporary, and/or occasional employees.
2. Fringe Benefits: Including employer-payroll taxes
3. Workers Compensation may be included as a fringe benefit or in Category 600 under insurance and bonding. Other benefits that may be provided at the employer's option include employee retirement plans, group health and hospitalization insurance, and life insurance.

II. TRAVEL

Allowable Costs- See 7 AAC 78.160(f) for the restrictions on allowable travel costs.

Costs are limited to the Grantee's written board policy if it is more restrictive than the current basic rates approved under the general government unit employees' agreement with the state; the basic allowances under that agreement; actual costs of moderately priced accommodations and meals; or for projects including federal grant funding, the costs allowable under the federal grant. The current state travel policies with mileage and per diem rates, may be found on the internet at -- <http://www.state.ak.us/local/akpages/ADMIN/dof/aam/aam.htm> -- under Travel/Moving AAM 60.010 – AAM 60.400, or copies can be requested from the contact person named in Section A (6) of the RFP.

1. Mileage - is allowed when staff is required to use their own vehicles in conducting project business. This does not include travel to and from work.
2. Air Fare - must be less than first class rate whenever available.
3. Taxi Fare, Auto Rental - when directly related to the delivery of services, or in the case of a course or conference, it is program related, will contribute to the grant project staff member's staff development, and is related to his/her assigned job duties.
4. Per Diem - for all travel outside the local community of the project.

[NOTE: Board approved per diem rates may not exceed state rates.]

III. FACILITY EXPENSE

Allowable Expenses

1. Facility Rental/Lease - Costs of renting or leasing a facility or office space are allowable when the costs are comparable to costs for similar space available in the same locality. The rental/lease agreement may include space rent, all or some utilities, repair, renovation, and maintenance costs, or it may include the space rental costs, with the grant applicant being the party responsible for providing for and paying for these facility costs. The general rule of thumb is if the landlord pays the bill at no extra charge to the applicant, the cost for the service is built into the space costs. If the landlord pays for the service and then charges the project for the service over and above the monthly rental charge or if the grant applicant arranges for and pays for the services directly, the cost for that service must be listed as a cost separate and distinct from the space cost.
2. Communications - telephone, Internet, e-mail, postage, shipping and radio communication expenses. Long distance telephone charges are allowable, but it is expected that these costs will be kept to a minimum in community oriented projects. Projects that provide statewide services would be expected to have a higher long distance call cost.
2. Utilities - heat, electric, water, sewer, and trash removal costs, when not included in the space rental cost.
3. Minor Repairs, Renovation, and Maintenance - Minor repairs, facility renovation and alteration, and maintenance costs when not included in the space rental costs. Minor repairs such as replacement of broken windows are to be distinguished from more expensive renovations and alterations. Renovation costs include the installation of sprinkler systems, fire or smoke detectors, showers, bathrooms, partitions, etc. Costs to be considered are labor costs when the renovation is provided by an outside firm as well as costs for materials. The use of DHSS grant funds may be approved if all alternative funding sources have been exhausted and the renovation is absolutely essential to the operation of the project. However, the use of grant funds for this purpose is rarely approved and specific approval must be obtained in advance from the Grantor to use Grant funds or Grant Income for this purpose. Maintenance costs such as janitorial or laundry services provided by an outside firm are allowable costs under this section. If project staff performs these services, the cost must be listed in PERSONAL SERVICES.

IV. SUPPLIES

Allowable Costs - Under this category are those items with a unit cost of less than \$300, or a useful life expectancy of less than one year.

1. Office Supplies - Pens, pencils, stationary, postage stamps, poster board, blank cassette tapes, paper, staplers, in-house printing supplies, desk supplies.
2. Program Supplies - Recreation and craft supplies; posters, pamphlets, brochures, and program related literature for distribution to clients, schools, or community agencies; educational and reference books for use by staff and clients; film rental and purchase costs.
3. Household Supplies - Cleaning supplies, including laundry, janitorial, and housekeeping supplies, kitchen and bed linens. Any other household supplies including non-food kitchen supplies.
4. Medical Supplies - Necessary medical supplies.
5. Food - Used only for grant project operations.
6. Other - Any supplies which do not fall within the scope of one of the above categories. Do not include dues, subscriptions, outside printing, or advertising costs--these costs are included in the OTHER category.

V. EQUIPMENT

Allowable Costs

1. Maintenance and Repairs - Costs associated with the maintenance and/or repair of equipment owned, leased, or rented. Those costs to be included under Office Equipment include service agreements for the maintenance and repair of photocopy machines, typewriters, etc.; miscellaneous repair costs for desks, chairs, filing cabinets, etc. Vehicle costs to be included are fuel, oil, spare parts, batteries, chains, tires, labor and parts costs for service calls, and major repairs performed by an outside firm.
2. Lease and/or Rental - Costs for leasing or renting project equipment such as typewriters, copy machines, vehicles used in the day-to-day operation of the project, occasional rental of trucks or vans to be used for purposes not normally performed by project vehicles, and occasional rental of audio-visual equipment.
3. Purchase - Equipment with a unit cost of more than \$300 or a useful life expectancy of more than one year, and which is considered necessary for program operations. Examples: desks, chairs, typewriters, file cabinets,

audio-visual equipment, medical equipment and furniture, household furniture and appliances. Include estimated shipping costs where appropriate.

Depreciation on major equipment is allowed in the same manner as for buildings and renovations.

VI. OTHER

Allowable Costs

1. Professional Services - Professional fees and program consultant costs when an outside firm provides these services; accounting and audit services; medical and legal fees. Include all costs for bringing a consultant to your agency to provide training, workshops, and lectures.
2. Insurance and Bonding – Insurance premiums for employee hazard, malpractice and other liability insurance for personnel, vehicles, facilities, and authorized activities of the grant project including bonding costs.
3. Subscriptions - Subscriptions to professional magazines, journals, or publications of a program nature; agency membership dues in a program-related professional organization.
4. Printing and Advertising - Printing costs for program literature or stationary when performed by an outside firm. Newspaper, radio, and Television advertising costs related to personnel recruitment, program operations, or program services.
5. Subcontracts - Project costs that the applicant is proposing to subcontract to another agency for the provision of services, either in whole or in part, designed to meet the goals and objectives outlined in the applicant's grant application program narrative. The conditions that apply to any proposed subcontractor are:
 - a. The applicant must describe the basis for the total project cost listed in this sub category.
 - b. Each subcontract must have the approval of the Grantor before work commences under the subcontract and before the Grantor will authorize reimbursement of any funds expended for the subcontract.
 - c. The subcontractor must conform to the same laws, regulations, and policies as the Grantee regarding the use of state funds awarded by the Grantor or of any grant income earned as the result of the award or under the subcontract. The Grantee is responsible to the Grantor for the subcontractor's performance under the subcontract.